

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JIENNAH MCCOLLUM, ROICE JOLEEN MCCOLLUM, AND
CHEYENNE MCCOLLUM,

PLAINTIFFS,

v.

ALEC BALDWIN,

DEFENDANT.

CASE NO. 1:22-cv-7328

DEFENDANT'S NOTICE OF
MOTION TO DISMISS
PLAINTIFFS' AMENDED
COMPLAINT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss, and upon all prior proceedings herein, Defendant Alexander R. Baldwin III hereby moves this Court, before the Honorable Edgardo Ramos, at the United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York, 10007, for an Order (i) pursuant to F.R.C.P. 12(b)(6) dismissing the Amended Complaint of Plaintiffs Jiennah McCollum, Roice Joleen McCollum, and Cheyenne McCollum, with prejudice; and (ii) such other and further relief that the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Civil Rule 6.1(b) of the Southern District of New York, and the Minute Entry for the Pre-Motion Conference held on October 19, 2022, before Judge Edgardo Ramos, opposition papers must be served no later than January 4, 2023.

Dated: November 30, 2022

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Luke Nikas

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